## **TSD File Inventory Index**

Date: <u>April 27, 2000</u> Initial: <u>CMbereiro</u>

	- 1-
Facility Name: Chicago Standi Facility Identification Number: 1LD 005255	o lily
	A STATE OF THE PROPERTY OF THE
A.1 General Correspondence	B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status	.1 Correspondence
.1 Correspondence	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	C.2 Compilance/Enforcement
.4 Financial Insurance (Sudden, Non Sudden)	.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests	.2 Import/Export Notifications
.6 Annual and Biennial Reports	C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring	D.1 Corrective Action/Facility Assessment
.1 Correspondence	.1 RFA Correspondence
.2 Reports	.2 Background Reports, Supporting Docs and Studies
A.4 Ciosure/Post Ciosure	.3 State Prelim. Investigation Memos
.1 Correspondence	.4 RFA Reports D. / · 4
.2 Closure/Post Closure Plans, Certificates, etc	D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring	.1 RFI Correspondence
.1 Correspondence	.2 RFi Workplan
.2 Reports	.3 RFI Program Reports and Oversight
B.1 Administrative Record	.4 RFI Draft /Final Report

Total -1

.5	RFI QAPP		.6 CMI QAPP	
.6	RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	· ·
.7	Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8	RFI Progress Reports		D.5 Corrective Action/Enforcement	
.9	Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10	Interim Measures Workplan and Reports		.2 Other Non-AR Documents	-
0.3 Cor	rective Action/Remediation Study		E. Boilers and Industrial Furnaces (BIF)	
.1	CMS Correspondence		.1 Correspondence	
.2	Interim Measures		.2 Reports	
.3	CMS Workplan	The state of the s	F.1 Imagery/Special Studies (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	155
.4	CMS Draft/Final Report		G.1 Risk Assessment	
.5	Stabilization		.1 Human/Ecological Assessment	
.6	CMS Progress Reports		.2 Compliance and Enforcement	200
.7	Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Cor	rrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1	CMI Correspondence		.5 Permitting	
.2	CMI Workplan		.6 Corrective Action/Remediation Study	
.3	CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation	77 A X 100
.4	CMI Draft/Final Reports		.8 Endangered Species Act	
.5	CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.			
Comments:	4		-

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

DATE:

MAY 04 1994

SUBJECT:

Justification for Withholding Executive Summary and Conclusions and Recommendations Sections of the Preliminary Assessment/Visual

Site Inspection

FROM:

Kevin M. Pierard, Chief

Technical Enforcement Section #1

RCRA Enforcement Branch

RECEIVED WMD RECORD CENTER

T0:

File

MAY 0 4 1994

The "Executive Summary" and "Conclusions and Recommendations" sections of the Preliminary Assessment/Visual Site Inspection (PA/VSI) are being withheld as enforcement confidential. This decision is based upon the Freedom of Information Act (FOIA) 5 U.S.C. §552. These sections are excluded based on exemptions 5 U.S.C. §552(b)(5), which state that the PA/VSI is a "predecisional, deliberative document" and 5 U.S.C. §552(b)(7)(A), "disclosure could reasonably interfere with enforcement proceedings".



#### RECEIVED WMD RECORD CENTER

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO. IL 60604-3590 OCT 20 1995

REPLY TO THE ATTENTION OF:

HRE-8J

March 31, 1994

Mr. John Credido Chicago Studio City 5660 W. Taylor Street Chicago, IL 60644

Re:

Visual Site Inspection

Former General Electric Company Facility

Chicago, Illinois ILD 005 255 096

Dear Mr. Credido:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/ Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief

Minnesota/Ohio Technical Enforcement Section

RCRA Enforcement Branch

Matthe of Ohl for



# TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7



PRC Environmental Management, Inc. 233 North Michigan Avenue Suite 1621 Chicago, IL 60601 312-856-8700 Fax 312-938-0118

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MAY 0 4 1994

#### PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

FORMER GENERAL ELECTRIC COMPANY CHICAGO, ILLINOIS ILD 005 255 096

**FINAL REPORT** 

#### Prepared for

# U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, DC 20460

Work Assignment No. : R05032

EPA Region : 5

 Site No.
 :
 ILD 005 255 096

 Date Prepared
 :
 March 24, 1994

 Contract No.
 :
 68-W9-0006

 PRC No.
 :
 309-R05032IL2N

Prepared by : PRC Environmental Management, Inc.

(Michael Keefe)

Contractor Project Manager : Shin Ahn

Telephone No. : (312) 856-8700 EPA Work Assignment Manager : Kevin Pierard

Telephone No. : (312) 886-4448

## CONTENTS

<u>Sectio</u>	<u>n</u>																			<u>Page</u>
EXEC	UTIVE	SUMM	ARY													 	٠.			ES-1
1.0	INTR	ODUCT	ION								• •					 				. 1
2.0	FACI	LITY DI	ESCRIPTION	1			• • •		• •							 	٠.	•		. 4
	2.1 2.2 2.3 2.4 2.5 2.6	FACII WAST HISTO REGU	LITY LOCAT LITY OPERA TE GENERAT ORY OF DOO ILATORY HI RONMENTA	TION TION CUM ISTO	NS . 1 AN IENT DRY .	ID M	AAN REL	AGE LEAS	EME SES	NT	•••					 	• •	•	• •	. 4 . 8 . 12 . 12
	2.7	2.6.1 2.6.2 2.6.3 2.6.4	Climate Flood Plain Geology and Groundwate	and d Soi er	ils	race V	Wate		• • •	• • •		•••		• •	• •	 • •		•		. 15 . 15 . 16
3.0			TE MANAGE		,															
4.0			ONCERN													•				
5.0	CON	CLUSIO	NS AND RE	COM	IME	NDA	OITA	NS	• •		· • •			٠.	: -	 		•	• •	. 23
REFE	RENCE	S							٠.						• •	 		•		. 26
Apper	<u>ıdix</u>																			
A	VISU.	AL SITE	E INSPECTIO	DN SI	UMN	MAR	Y A	.ND	PHO	ото	GR	AP	HS		•					^
В	VISU.	AL SITE	E INSPECTIO	)N FI	IELC	O NO	OTE:	S												

## **FIGURES**

<u>Figure</u>	<u> </u>	Page
1	FACILITY LOCATION	5
2	FACILITY LAYOUT	7
	TABLES	
<u>Table</u>		<u>Page</u>
1	SOLID WASTE MANAGEMENT UNITS	9
2	SOLID WASTES	10
3	SOIL CONTAMINATION AT ASC FACILITY	22
4	SWMII AND ACC SIIMMARY	25

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#### **EXECUTIVE SUMMARY**

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the former General Electric Company (GE) facility in Chicago, Cook County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

GE manufactured household laundry equipment at the facility between 1948 and 1983. The facility occupies 17.4 acres in an industrial and residential area. GE facility operations included metal finishing, a variety of metal coating operations, degreasing, pickling, machining, and assembly. GE facility waste streams and waste management practices are not well documented. According to the Part A permit application submitted by GE to the U.S, Environmental Protection Agency (EPA) in 1980, the facility generated acid pickling wastewater of unknown waste code(s), waste paint solvent (D001 and F003), and black paint skimmings (D001). The Part A permit application also lists the following hazardous waste codes without identifying specific wastes: D001, D002, D008, F001, and F006. In early 1983, GE facility operations ceased and the facility was RCRA closed. In January 1984, GE submitted a closure plan and a closure certification by a professional engineer to the Illinois Environmental Protection Agency (IEPA). However, the PA file does not document that EPA or IEPA approved RCRA closure.

In June 1983, GE sold the facility to Corbitt Manufacturing Company (Corbitt) of St. Louis, Missouri. Corbitt removed all machinery and salvageable metal from facility buildings and demolished some facility structures. Between 1984 and 1987, Corbitt sold various portions of the facility to JDC Properties, Inc. (JDC); Barry Machinery Corporation; Anderson Shumaker Company (ASC); and Spectrum Partners, Inc. (Spectrum). In September 1993, Barry Machinery Corporation sold its property to JDC. Current facility owners are JDC, ASC, and Spectrum. Chicago Studio Rentals, Inc. (CSR), which is owned by JDC, rents building space and equipment to movie and television show producers for filming.

ASC is an open die forging company that began operations adjacent to the former GE facility in 1913. In 1990, ASC expanded its operations by building a warehouse on a portion of the former GE facility. Two facility waste streams are managed in this building: nonhazardous swarf and nonhazardous used oil.

Chicago Studio Rentals, Inc. (CSR), which is owned by JDC, operates the JDC portion of the former GE facility. CSR generates no waste streams. However, production companies renting space from CSR may generate hazardous paint waste (F003 and F005) during set construction. In the past, production companies have filed Notification of Hazardous Waste Activity forms with EPA for paint waste generation.

Spectrum leases building space to two tenants: Iron Mountain Company and Norris Company. Iron Mountain Company stores paper records; for example, bank files. Norris Company stores dry goods such as appliances and new, empty food and beverage containers.

The PA/VSI identified the following three SWMUs and one AOC at the facility:

Solid Waste Management Units

- 1. Former Wastewater Treatment System (WWTS)
- 2. Swarf Storage Area
- 3. Used Oil Storage Area

Areas of Concern

1. ASC Facility Subsurface Area

SWMU 1 was protectively listed in GE's Part A permit application because it was exempt from RCRA regulations. The past potential for a release of hazardous waste or hazardous constituents from SWMU 1 is unknown due to limited information regarding release controls. The current potential for a release to the environment is low because the unit is no longer present at the facility. The former GE facility was certified as RCRA closed in accordance with a GE closure plan by an independent professional engineer.

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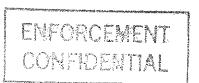
ENFORCEMENT

SWMUs 2 and 3 currently manage nonhazardous waste in 55-gallon drums on a concrete floor inside a large building. The wastes are not volatile; therefore, the potential for release to air is low. The potential for release to soil, groundwater, and surface water is also low because the units are indoors, have a concrete base, and manage small volumes (less than three drums) of waste.

Soil contamination has been documented at the ASC Facility Subsurface Area (AOC 1). In 1990, in order to obtain financing for new construction, ASC conducted a subsurface investigation to determine whether releases had occurred at the ASC facility. An ASC contractor drilled seven soil borings at various locations on ASC property. Twenty-two soil samples were collected from depths of between 1 and 11 feet below ground surface. Soil samples were analyzed for volatile organic compounds, metals, cyanide, polynuclear aromatic (PNA) compounds, and polychlorinated biphenyls (PCB). Soil samples contained 1,2-dichloroethene and trichloroethene at concentrations of up to 4,600 and 2,500 micrograms per kilogram, respectively. Soil samples also contained arsenic, barium, chromium, lead, copper, nickel, and zinc above detection limits. No PNAs or PCBs were detected in the soil samples. The source and extent of contamination is unknown. Because the area is primarily covered with asphalt or concrete and the documented contamination is in the subsurface soil, the potential for a release to surface water or air is low. Shallow groundwater may be present at the facility beginning 8 feet below ground surface; therefore, the potential for a release to groundwater is moderate. However, because groundwater is not used for drinking water near the facility, the potential for contaminants to migrate to receptors appears low.

The nearest residential area is located west of the facility across Menard Avenue. The nearest school, Clark School, is located about 500 feet west of the facility. Facility access is controlled by a chain-link fence. The nearest surface water body, the Des Plaines River, is about 3 miles west of the facility and is used for recreational purposes. Other significant water bodies in the area are the Chicago Sanitary and Ship Canal and Lake Michigan. The Chicago Sanitary and Ship Canal is about 4 miles south of the facility and is used for industrial purposes. Lake Michigan, which is about 8 miles east of the facility, is used for drinking water supply, industrial, and recreational purposes. Groundwater is not used as a public water supply source. No drinking water wells are located in the facility area. The nearest industrial well is located 0.5 mile southeast of the facility. The groundwater flow gradient is unknown; however, based on surface topography, shallow groundwater probably flows southwest. Sensitive environments are not located on site. The nearest sensitive

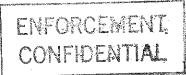




environments are Columbus Park, located 1,000 feet north of the facility, and Palos Forest Preserve, located 16 miles southwest of the facility.

PRC recommends no further action for SWMUs 1 through 3. PRC recommends that ASC define the source and extent of soil contamination at the ASC Facility Subsurface Area (AOC 1) under IEPA or EPA supervision.

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#### 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the former General Electric Company (GE) facility (EPA Identification No. ILD 005 255 096) in Chicago, Cook County, Illinois. The PA was

completed on January 12, 1994. PRC gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. The VSI was conducted on January 14, 1994. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified three SWMUs and one AOC at the facility.

The VSI is summarized and four inspection photographs are included in Appendix A. Field notes from the VSI are included in Appendix B.

#### 2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

#### 2.1 FACILITY LOCATION

The former GE facility is located at 5660 West Taylor Street in Chicago, Cook County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41°52'15" N and longitude 87°46'30" W). The facility occupies 17.4 acres in an industrial and residential area.

The facility is bordered on the north by the Chicago and Northwestern railroad and the Eisenhower Expressway (Route 290), on the west by Menard Avenue and a residential area, on the south by Taylor Street and several industrial buildings, and on the east by Central Avenue.

#### 2.2 FACILITY OPERATIONS

The former GE facility consisted of two large buildings (Plant 1 and Building 29) and parking lots. Plant 1 contained about 400,000 square feet (ft<sup>2</sup>) of floor space. Building 29 contained 55,580 ft<sup>2</sup> of floor space. The GE Major Appliance Business Group conducted operations at the facility; however, specific operations are not well documented. According to the GE Part A permit application, the facility began operations in June 1948 and manufactured household laundry equipment such as electric clothes dryers (GE 1980).

Based on IEPA air permits and SWMUs identified in the Part A permit application, GE conducted the following operations: vitreous enamel finishing, synthetic enamel coating, "black Japan" painting, synthetic enamel spray washing, vapor degreasing, machining, belt sanding, spray pickling, plastic bonding, and paint stripping. Metal machining and assembly operations were also probably conducted at the facility (GE 1980). GE facility operations ended in early 1983.



In June 1983, GE sold the facility to Larry Deutsch of the Corbitt Manufacturing Company (Corbitt) of St. Louis, Missouri (GE 1984b). Corbitt removed all machinery and salvageable metal from facility buildings and demolished interior sections of Plant 1. Between 1984 and 1987, Corbitt sold various portions of the facility to JDC Properties, Inc. (JDC); Barry Machinery Corporation; Anderson Shumaker Company (ASC); and Spectrum Partners, Inc. (Spectrum).

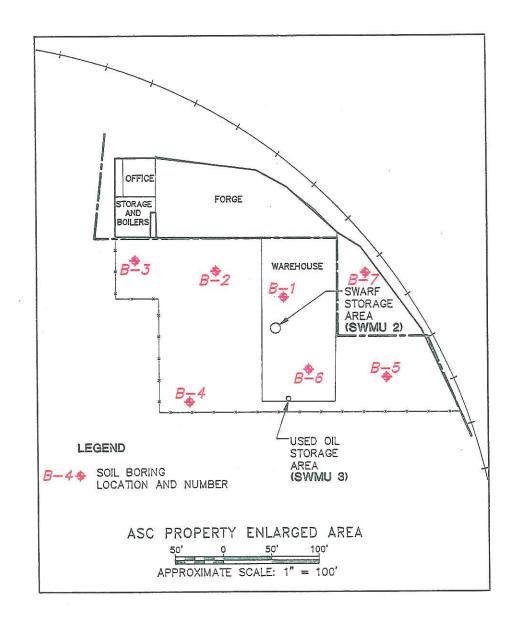
In September 1993, JDC purchased the property owned by Barry Machinery Corporation. Current facility owners are JDC, ASC, and Spectrum (see Figure 2). Chicago Studio Rentals, Inc. (CSR), which is owned by JDC, rents building space and equipment to movie and television show producers for filming. CSR has about nine employees that work in the CSR office at the facility.

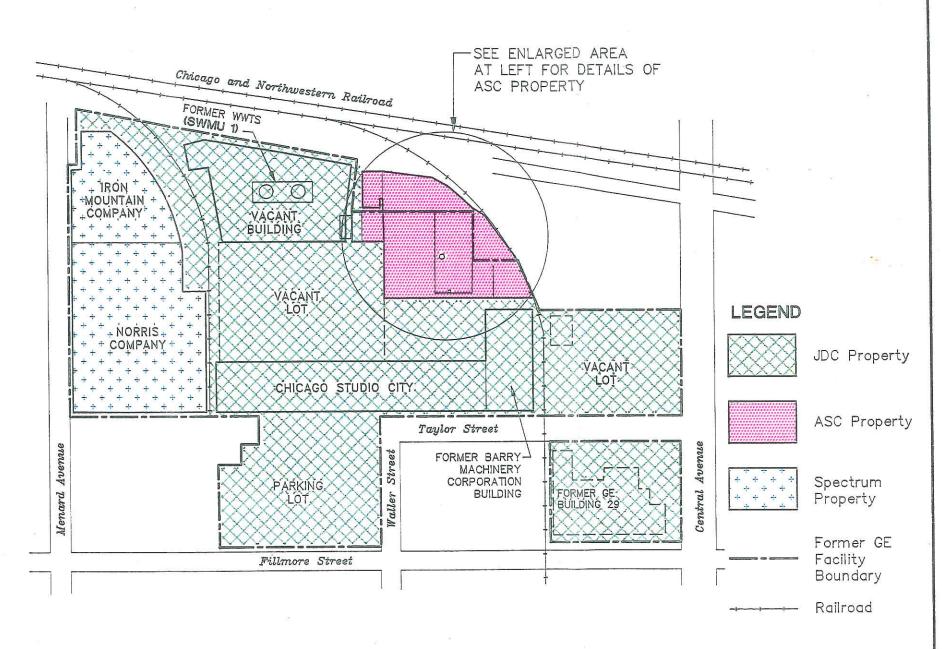
ASC is an open die forging facility that began operations adjacent to the GE facility in 1913. ASC operations include cutting steel billet stock, heating cut pieces of steel, and forging the heated stock in accordance with customer specifications. Basic ASC forging operations have not changed since the original ASC facility was founded. ASC employs about 32 people.

The ASC facility consists of four buildings (see Figure 2). Building 1 is used for offices; Building 2 houses two boilers that generate steam to operate large forging hammers and is also used for miscellaneous storage; and Building 3 is used for all forging operations. These three buildings form the original ASC facility. In 1984, ASC purchased a 57,000 ft<sup>2</sup> parcel of the former GE facility from Corbitt. In 1990, ASC constructed a 16,000-ft<sup>2</sup> warehouse (Building 4) on this parcel of land. Building 4 is used to store steel billet stock, conduct rough machining operations on forged parts, and store some facility wastes.

Spectrum leases building space to two tenants: Iron Mountain Company and Norris Company. Iron Mountain Company stores paper records; for example, bank files. Norris Company stores dry goods such as appliances and new, empty food and beverage containers. No known SWMUs are located on Spectrum Property. Furthermore, according to Mr. John Credidio of JDC, JDC is currently in the process of purchasing the Spectrum property (PRC 1994b).







100' 0 100' 200' APPROXIMATE SCALE: 1" = 200'

FORMER GENERAL ELECTRIC COMPANY FACILITY CHICAGO, ILLINOIS

FIGURE 2
FACILITY LAYOUT

TOTAL ENVIRONMENTAL MANAGEMENT, INC.

#### 2.3 WASTE GENERATION AND MANAGEMENT

This section describes past and current waste generation and management at the former GE facility. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and the AOC, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

Former GE acid pickling operations generated wastewater of unknown waste code(s) that was treated on site in the Former Wastewater Treatment System (WWTS) (SWMU 1). However, based on information in the GE Part A permit application, the hazardous waste code was probably D002 (GE 1980). Wastewater treatment operations consisted of elementary neutralization, pH adjustment, flocculation, and settling to remove iron and nickel. Treated wastewater was discharged to the Chicago Metropolitan Sanitary District (CMSD) sewer system (GE 1983e). According to the GE Part A permit application, GE generated wastewater treatment sludge (F006) (GE 1980). Although not discussed in other GE documents, SWMU 1 probably generated the wastewater treatment sludge listed in the Part A permit application. The location where this sludge was managed is not documented in the PA files.

Several other waste streams are also identified on the GE Part A permit application that have no corresponding generation information or SWMUs. Specifically, wastes with the following waste codes were stored in containers: F001, D001, D002, and D008 (GE 1980). These wastes were probably generated from painting operations. The SWMU(s) that managed these wastes is(are) unknown.

The 1982 IEPA Generator Annual Hazardous Waste Report for the GE facility indicates that the facility generated 1,980 gallons of waste paint solvent (F003 and D001) and 7,905 gallons of black paint skimmings (D001) from painting operations (GE 1983d). Documents reviewed during the PA do not indicate the facility areas used for painting operations or the SWMU(s) managing paint-related wastes. The files reviewed for the PA do not contain any other information regarding GE waste streams, generation rates, and management practices. PRC contacted GE regarding former GE operations; however, no additional information was available (PRC 1994a).

TABLE 1
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit <sup>a</sup>	Status
1	Former WWTS	No <sup>b</sup>	Inactive, underwent RCRA closure
2	Swarf Storage Area	No	Active; manages nonhazardous waste
3	Used Oil Storage Area	No	Active; manages nonhazardous waste
Note:			
a A	PCPA hazardous waste manag	ement unit is one that current	ly requires or formerly required

A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

This SWMU was identified on the GE Part A permit application (GE 1980). However, according to subsequent closure documents, SWMU 1 was protectively listed on the Part A permit application (GE 1983e) (see Section 2.5).

## TABLE 2 SOLID WASTES

Waste/EPA Waste Code <sup>a</sup>	Source	Solid Waste Management Unit <sup>b</sup>
Former GE Facility Wastes		
Wastewater/Unknown	GE acid pickling operations	1 '
Wastewater Treatment Sludge/F006	GE wastewater treatment operations	Unknown
Unidentified wastes/ F001, D001, D002, and D008	GE painting operations	Unknown
Waste Paint Solvent/F003 and D001	GE painting operations	Unknown
Black Paint Skimmings/D001	GE painting operations	Unknown
Current Wastes		
Swarf/NA	ASC machining operations	2
Used Oil/NA	ASC forklift maintenance	3
Paint Waste/F003 and F005	Film set construction at CSR	Unknown

## Notes:

a Not applicable (NA) designates nonhazardous waste.

b "Unknown" indicates that the waste was generated at the facility but that the waste code or the SWMU managing the waste cannot be determined.

Machining and maintenance operations at ASC generate two nonhazardous waste streams that are managed on former GE property: fine metallic machining residue known as "swarf" and used oil. Swarf is generated from grinding machines in Building 4 and is stored in 55-gallon drums on pallets near the grinding machines in the Swarf Storage Area (SWMU 2). ASC generates about 100 cubic yards of swarf annually. Swarf is currently considered a special waste for landfilling purposes, and ASC's disposal contractor, Waste Management, Inc., has filed an IEPA special waste permit application for ASC.

Used oil is generated from ASC forklift maintenance and is stored in 55-gallon drums in the Used Oil Storage Area (SWMU 3), which is located in Building 4. ASC generates about 100 gallons of used oil annually. Used oil is picked up by a tanker truck and is reclaimed at Beaver Oil Company in Hodgkins, Illinois.

ASC also generates waste nonflammable, water-based degreasing liquid. However, this waste stream, which is discharged to the Greater Chicago Water Reclamation District (GCWRD) sewer system, is not managed within the boundaries of the former GE facility; therefore, waste degreasing liquid is not discussed further in this report.

CSR rents building space to film producers and does not generate waste directly. According to Ron DeRosa of CSR, production companies that rent space from CSR are responsible for all waste generated during production. In the past, some production companies have filed EPA Notification of Hazardous Waste Activity (NHWA) forms. For example, in June 1990, Backdraft, Inc., filed a NHWA form for generating small quantities (less than 1,000 kilograms per month) of hazardous paint waste (F003 and F005) during set construction (Backdraft 1990). Typically, production companies build a "storage box" for paint waste. Mr. DeRosa did not know where paint waste has been stored at the facility or the off-site disposal location for paint waste. Mr. DeRosa stated that the production company rents the space "clean" and must leave the space clean when production activities are finished.

#### 2.4 HISTORY OF DOCUMENTED RELEASES

No history of documented releases is associated with GE operations before the facility was sold in 1983. However, releases have been documented in the ASC Facility Subsurface Area (AOC 1). Soil samples collected from AOC 1 contained 1,2-dichloroethene (DCE) and trichloroethene (TCE) at concentrations of up to 4,600 and 2,500 micrograms per kilogram ( $\mu$ g/kg), respectively. Soil samples also contained arsenic, barium, chromium, lead, copper, nickel, and zinc above detection limits (ASC 1990). Contamination associated with AOC 1 is summarized in more detail in Section 4.0.

#### 2.5 REGULATORY HISTORY

No NHWA form to EPA from GE was in the files reviewed for the PA. However, according to a 1983 IEPA inspection report, the facility submitted a NHWA form to EPA on August 18, 1980 (IEPA 1983a). At that time, the facility notified as a generator and treatment, storage, and disposal facility. GE submitted a RCRA Part A permit application on November 14, 1980 (GE 1980). The Part A permit application indicates 2,500 gallons of tank storage (S02) and 144,000 gallons per day of other treatment (T04). According to the Part A permit application, the "other treatment" consisted of pH adjustment and nickel and iron removal from facility wastewater. Hazardous waste management units identified in the Part A permit application include the Former WWTS (SWMU 1) and the former black Japan paint system underground storage tank (UST). Waste codes, quantities, and associated process codes identified in the 1980 Part A permit application are listed below.

EPA Waste Code	Estimated Annual Quantity	Process Code
D002	300 tons	T04
D002	8,280 tons	T04 and S02
D001	12 tons	S02
F001	87,965 pounds	S01
D002	138 tons	S01
D008	626 tons	S01
D001	82 tons	S01
F006	2,164 pounds	S01

Container storage (S01) is listed with waste codes and annual quantity information; however, the process design capacity for container storage and the location of the container storage area(s) is not indicated in the Part A permit application. PRC contacted GE regarding container storage at the facility; however, no additional information was available (PRC 1994a).

After the 1980 Part A permit application, the earliest regulatory documents in the files reviewed for the PA are from June 1982 and January and May 1983. These documents pertain to GE's financial responsibility for liability coverage and closure or post-closure care (GE 1982, GE 1983a, and GE 1983b). In June 1983, GE notified IEPA that the facility had been sold (GE 1983c).

In September 1983, GE notified EPA that the facility was sold in June 1983 and was not subject to formal RCRA closure procedures for the following reasons: (1) GE did not file for permanent hazardous waste storage in containers; (2) during and after production stopped, wastes were removed within 90 days of generation; (3) the Former WWTS (SWMU 1) performed elementary neutralization, which is not regulated under RCRA; and (4) although the former black Japan paint system UST is listed on the 1980 Part A permit application, the unit was designed as a temporary, emergency storage tank in case of fire, was never used, and was empty when production at the facility ceased (GE 1983e). Therefore, although the former black Japan paint system UST was listed on the Part A permit application, it is not considered a SWMU because it never stored waste.

The facility was inspected by IEPA on December 2, 1983 (IEPA 1983a). According to inspection notes, the facility was vacant and clean during the inspection. IEPA noted that according to shipping manifests, a shipment of hazardous waste (surplus paint product) left the facility on October 14, 1983, which is greater than 90 days after closure operations ceased. Therefore, the facility was operating as a storage facility. IEPA also noted that the "facility was diligent in the removal of the waste and there is no evidence of environmental harm resulting from the extended time required to complete the removal of the waste remaining at the facility at the time operations stopped" (IEPA 1983a).

After this inspection, IEPA notified GE that the facility violated the Illinois Administrative Code by not filing a closure plan and requested a closure plan within 10 days (IEPA 1983b). IEPA did not refer to inspection findings of greater than 90-day storage in the notification letter. GE submitted a

facility closure plan and closure certification by a professional engineer to IEPA in January 1984 (GE 1984a and SCL 1983). GE's closure plan indicates that wastes were disposed of within 90 days. No document from EPA or IEPA in the PA file formally approves closure.

GE identified 18 IEPA air permits in its Part A permit application (GE 1980). No record of air permit violations by GE exists, and no odor complaints were noted in the PA file. ASC has one IEPA air permit (No. 03040692) for the facility boiler. The ASC facility has no record of air permit violations.

No past or current facility owners were required to obtain National Pollutant Discharge Elimination System permits because wastewater and storm water discharge to the GCWRD (IEPA 1974).

Two 1,200-gallon USTs at the ASC facility were abandoned and filled with sand in 1949. These USTs are located beneath the boiler building (Building 2) (ASC 1990). Besides the former black Japan paint system UST, which was closed in 1983, no other known UST exists at the facility. Because the black Japan paint system UST was identified on the GE Part A permit application, a photograph of the tank's former location was taken during the VSI (see Photograph No. 3).

#### 2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and groundwater in the vicinity of the facility.

#### 2.6.1 Climate

The climate in Cook County is continental. The average daily temperature is 49.2 °F. The lowest average daily temperature is 21.4 °F in January. The highest average daily temperature is 73 °F in July (NOAA 1990). Lake Michigan, which is about 8 miles east of the facility, has a moderating influence on temperatures.

The total annual precipitation for the county averages 33.3 inches (NOAA 1990). The mean annual lake evaporation is about 30 inches. The 1-year, 24-hour maximum rainfall recorded in the area is 2.4 inches (NOAA 1990).

The prevailing wind is from the west-southwest. Average wind speed is highest in April at 12 miles per hour (NOAA 1990).

#### 2.6.2 Flood Plain and Surface Water

The former GE facility is not located in a 100-year flood plain (FEMA 1983). The land surface in the facility area is relatively flat. Storm water runoff from the facility flows to storm sewers that discharge to the GCWRD sewer system.

The nearest surface water body, the Des Plaines River, is about 3 miles west of the facility and is used for recreational purposes. Other significant water bodies in the area are the Chicago Sanitary and Ship Canal and Lake Michigan. The Chicago Sanitary and Ship Canal is about 4 miles south of the facility and is used for industrial purposes. Lake Michigan, which is about 8 miles east of the facility, is used for drinking water supply, industrial, and recreational purposes.

#### 2.6.3 Geology and Soils

The facility is located in an area composed of soils from the Wadsworth Till Member of the Wendron Formation and the Carmi Member of the Equality Formation. These soils consist of silts and clays formed on lake plains or along drainageways on uplands (ASC 1990). However, based on observations during the VSI and soil borings from the ASC facility, it appears that most of the facility is underlain by fill material. The facility and surrounding area are mostly covered with concrete or asphalt surfaces, buildings, or fill.

The geology in the region has been documented by the Illinois State Geological Survey (ISGS). The region is underlain by about 55 feet of glacial drift. The drift is underlain by about 320 feet of Silurian Period dolomites. Beneath the dolomites are four members of Ordovician age: Maquoketa Shale-Dolomite, Galena-Platteville Dolomite, St. Peter Sandstone, and Oneota Dolomite. The

St. Peter Sandstone is the only significant water-bearing unit of Ordovician age and lies almost 900 feet below ground surface in the region (ISGS 1943).

#### 2.6.4 Groundwater

The unconsolidated glacial drift beneath the facility may contain groundwater; however, because the area is urban and highly developed, it is unlikely that this water is used. No private wells are present within 1 mile of the facility. One industrial groundwater well is located 0.5 mile southeast of the facility at the Kropp Forge Company in Cicero, Illinois. Groundwater beneath the facility is estimated to be 8 to 12 feet below ground surface. Based on regional topography, shallow groundwater may flow southwest to the Des Plaines River or the Chicago Sanitary and Ship Canal (ASC 1990).

#### 2.7 RECEPTORS

The facility occupies 17.4 acres in an industrial and residential area in Chicago, Illinois. Chicago has a population of about 2,784,000 (Rand McNally 1993).

The former GE facility is located at 5660 West Taylor Street in Chicago, Cook County, Illinois. The facility is bordered on the north by the Chicago and Northwestern railroad and the Eisenhower Expressway (Route 290), on the west by Menard Avenue and a residential area, on the south by Taylor Street and several industrial buildings, and on the east by Central Avenue. The nearest residential area is located west of the facility across Menard Avenue. The nearest school, Clark School, is located about 500 feet west of the facility. Facility access is controlled by a chain-link fence.

The nearest surface water body, the Des Plaines River, is about 3 miles west of the facility and is used for industrial purposes. Other significant water bodies in the area are the Chicago Sanitary and Ship Canal and Lake Michigan. Groundwater is not used as a public drinking water supply source. No drinking water wells are located within 1 mile of the facility. The nearest industrial well is located 0.5 mile southeast of the facility. The groundwater flow gradient is unknown; however, based on surface topography, shallow groundwater probably flows southwest.

Sensitive environments are not located on site. The nearest sensitive environments are Columbus Park, located 1,000 feet north of the facility, and Palos Forest Preserve, located 16 miles southwest of the facility.

#### 3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the three SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

#### SWMU 1

#### Former WWTS

Unit Description:

Descriptive information for this unit is limited. The unit consisted of a collection of tanks and a Lamella sludge separation unit used to treat GE facility wastewater. Tank volume, construction material, and layout of the unit are unknown. Unit processes included elementary neutralization, pH adjustment, flocculation, and settling to remove iron and nickel. The GE Part A permit application indicates a treatment capacity of 144,000 gallons per day (GE 1980). However, this value reflects the combined capacity of the neutralization unit and the sludge separation unit. The overall system capacity was about 72,000 gallons per day (GE 1984a).

Date of Startup:

Facility operations began in 1948; however, the exact startup date for this unit is unknown.

Date of Closure:

This unit was closed in 1983, soon after operations at the facility ceased. GE maintained that the unit was exempt from RCRA regulations (see Section 2.5). The unit was demolished and removed from the facility by Corbitt.

Wastes Managed:

This unit managed GE facility wastewater of unknown waste code(s) (acid pickling wastewater containing nickel and iron). Treated wastewater was discharged to the CMSD sewer system.

Release Controls:

Release controls associated with this unit are unknown.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

The building that housed this unit was vacant and dilapidated at the time of the VSI (see Photograph No. 4). Evidence of sumps and containment areas in the concrete floor of the building may be associated with this unit. No evidence of release was observed.

SWMU 2

Swarf Storage Area

Unit Description:

This unit is in the ASC warehouse (Building 4) and stores drums containing swarf. The dimensions of the area are about 6 feet by 6 feet. The area is not distinguished by floor markings.

Date of Startup:

This unit began operating in 1990, after the warehouse was constructed.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages nonhazardous swarf generated by machining and grinding operations.

Release Controls:

The unit is located indoors and has a concrete base. No curbs, dikes, or other secondary containment systems are associated with the unit.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

During the VSI, three open 55-gallon drums containing swarf were stored on a wood pallet in this area (see Photograph No. 1). The swarf in the drums was soaked with machining lubricant. No

evidence of release was observed in the area. No cracks or gaps were observed in the concrete base of the unit.

SWMU 3

Used Oil Storage Area

Unit Description:

This unit is in the ASC warehouse (Building 4) and stores drums containing used oil. The dimensions of the area are about 6 feet by 3 feet. The area is not distinguished by floor markings.

Date of Startup:

This unit began operating in 1990, after the warehouse was

constructed.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages nonhazardous used oil generated from forklift

maintenance.

Release Controls:

The unit is located indoors and has a concrete base. No curbs, dikes,

or other secondary containment systems are associated with the unit.

History of

Documented Releases:

No releases from this unit have been documented.

Observations:

During the VSI, one closed 55-gallon drum containing used oil was stored on the floor in this area (see Photograph No. 2). No evidence of release was observed in the area. No cracks or gaps were observed in the concrete base of the unit.

#### 4.0 AREA OF CONCERN

PRC identified one AOC during the PA/VSI. This AOC is discussed below; its location is shown in Figure 2.

#### AOC 1 ASC Facility Subsurface Area

In 1990, in order to obtain financing for Building 4 construction, ASC conducted a subsurface investigation to determine whether releases had occurred in the vicinity of the ASC facility. An ASC contractor drilled seven soil borings at various locations on ASC property, including locations on former GE facility property (see Figure 2). Twenty-two soil samples were collected from depths of between 1 and 11 feet below ground surface. Soil samples were analyzed for volatile organic compounds (VOC), metals, cyanide, polynuclear aromatic (PNA) compounds, and polychlorinated biphenyls (PCB). Table 3 summarizes the analytical results for VOCs, metals, and cyanide at each boring location. The background concentrations of these contaminants in the facility area is unknown. No PNAs or PCBs were detected in the soil samples. The source and extent of contamination is unknown.

TABLE 3 SOIL CONTAMINATION AT ASC FACILITY

	SOIL BORING LOCATION <sup>1</sup>								
COMPOUND DETECTED	B1	B2	В3	B4	B5	В6	В7		
Acetone (μg/kg)	160	47	58	NA <sup>2</sup>	NA	98	590 J <sup>3</sup>		
Carbon disulfide (µg/kg)	7	3 J	BDL <sup>4</sup>	NA	NA	BDL	BDL		
1,1-Dichloroethene (µg/kg)	BDL	8	BDL	NA	NA	BDL	BDL		
1,2-DCE (μg/kg)	BDL	23	BDL	NA	NA	380	4,600		
TCE (μg/kg)	BDL	15	10	NA	NA	530	2,500		
Arsenic (mg/kg) <sup>5</sup>	6.6	3.6	4.3	3.6	4.3	3.1	6.2		
Barium (mg/kg)	74	65	81	51	28	31	220		
Chromium (mg/kg)	11	29	21	11	9.9	2.5	10		
Lead (mg/kg)	14	61	680	26	13	6.5	180		
Copper (mg/kg)	24	24	65	24	20	9.4	38		
Nickel (mg/kg)	35	83	130	90	30	11	69		
Zinc (mg/kg)	41	61	220	63	43	52	310		
Cyanide (mg/kg)	NA	NA	NA	BDL	NA	BDL	3.0		

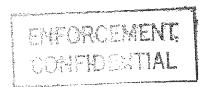
### Notes:

The highest concentration detected at each soil boring location is listed for each compound.

- $^2$  NA = Not analyzed
- J indicates an estimated value.
- BDL = Below detection limit
- 5 mg/kg = Milligram per kilogram

Recommendations:

PRC recommends no further action.



AOC 1

**ASC Facility Subsurface Area** 

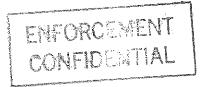
Conclusions:

ASC facility soils contain documented concentrations of VOCs and metals. However, the source and extent of soil contamination have not been well defined. Because the area is primarily covered with asphalt or concrete and the documented contamination is subsurface soil, the potential for a release to surface water or air is low. Shallow groundwater may be present at the facility beginning 8 feet below ground surface; therefore, the potential for a release to groundwater is moderate. However, because groundwater is not used for drinking water near the facility, the potential for contaminants to migrate to receptors appears low.

Recommendations:

PRC recommends that ASC define the source and extent of soil contamination at the ASC facility under IEPA or EPA supervision.

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## TABLE 4 SWMU AND AOC SUMMARY

	SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1.	Former WWTS	1943 or later to 1983	None	No further action
2.	Swarf Storage Area	1990 to present	None	No further action
3.	Used Oil Storage Area	1990 to present	None	No further action
1.	AOC  ASC Facility Subsurface Area	Dates of Operation  Unknown to present	Evidence of Release  Soil contamination documented during 1990 environmental assessment; VOCs such as DCE and TCE, and metals such as lead, nickel, and zinc detected	Recommended Further Action  ASC should define the source and extent of soil contamination at the facility under IEPA or EPA supervision.

RELEASED 26/20
RIN # TOTALS TOTAL
INITIALS TOTAL

#### REFERENCES

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- Backdraft, Inc. (Backdraft). 1990. Notification of Hazardous Waste Activity (NHWA). June 20.
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- GE. 1983c. Letter Regarding Facility Sale. From Alfred Smith. To Larry Eastep, Illinois Environmental Protection Agency (IEPA). June 4.
- GE. 1983d. IEPA Generator Annual Hazardous Waste Report. June 20.
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- U.S. Geological Survey (USGS). 1978a. 7.5-Minute Series Topographic Map of Chicago Loop, Illinois, Quadrangle.
- USGS. 1978b. 7.5-Minute Series Topographic Map of River Forest, Illinois, Quadrangle.
- USGS. 1980a. 7.5-Minute Series Topographic Map of Englewood, Illinois, Quadrangle.
- USGS. 1980b. 7.5-Minute Series Topographic Map of Berwyn, Illinois, Quadrangle.

## APPENDIX A

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

(4 Pages)

#### VISUAL SITE INSPECTION SUMMARY

Former General Electric Company (GE)
5660 West Taylor Street
Chicago, Illinois 60644
ILD 005 255 096

Date:

January 14, 1993

GE Facility Representative:

GE Telephone No.:

Bob Anderson, GE (502) 452-5839

Anderson Shumaker Company (ASC)

Facility Representatives:

Peter Jaworowski, ASC Richard Tribble, ASC

Dan Biederman, Hinshaw and Culbertson

Ron Wilkins, Heritage Remediation/Engineering, Inc.

ASC Telephone No.:

(312) 287-0874

JDC Properties, Inc. (JDC)

Facility Representative:

JDC Telephone No.

Ron DeRosa, Chicago Studio Rentals

(312) 261-3400

Inspection Team:

Michael Keefe, PRC Environmental Management, Inc. (PRC)

Carla Buriks, PRC

Photographer:

Carla Buriks, PRC

Weather Conditions:

Sunny, windy, and cold (about 0 °F)

Summary of Activities:

GE sold the facility in 1983. Current property owners are ASC and JDC. The visual site inspection (VSI) began at 8:30 a.m. at ASC with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. ASC representatives then discussed ASC's past and current operations, solid wastes generated, and release history. ASC representatives stated that requested documents would be sent to PRC. The VSI tour began at 9:15 a.m. The inspection team observed facility operations and identified solid waste management units (SWMU) in ASC Building 4,

which is located on former GE property.

The ASC facility tour concluded at 10:00 a.m., after which the inspection team held an exit meeting with ASC facility representatives. The VSI was completed and the inspection

team left the ASC facility at 10:10 a.m.

At 10:15 a.m., the inspection team arrived at Chicago Studio Rentals, Inc. (CSR), which is owned by JDC. The inspection team explained the purpose of the VSI and the agenda for the visit. Mr. DeRosa stated that no wastes are generated by CSR. The inspection team toured the CSR buildings, photographed former SWMU locations, and left the facility at 11:20 a.m.



Photograph No. 1 Orientation:

Description:

North

Swarf Storage Area; swarf is stored in 55-gallon drums in the foreground

Photograph No. 2 Location: SWMU 3 Orientation: South Date: 01/14/94

Description: Used Oil Storage Area; used oil

is stored in the black 55-gallon drum



Location: SWMU 2

Date: 01/14/94



Photograph No. 3

Location: Former Underground Storage Tank (UST)

Orientation:

Northeast

Date: 01/14/94

Approximate location of former black Japan paint system UST; Anderson Shumaker Description:

Company (ASC) facility shown in background



Photograph No. 4

Location: SWMU 1

Orientation:

Date: 01/14/94

Approximate location of Former Wastewater Treatment System (WWTS) inside vacant Description:

building owned by JDC Properties, Inc., (JDC), east of ASC facility

# APPENDIX B VISUAL SITE INSPECTION FIELD NOTES

(Nine Sheets)

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## REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

OCT 25 1995

REPLY TO THE ATTENTION OF:

HRE-8J

January 10, 1994

Mr. John Credidio Chicago Studio City 5660 W. Taylor Street Chicago, IL 60644

Re:

Visual Site Inspection

Former General Electric Company Facility

Chicago, IL ILD 005 255 096

Dear Mr. Credidio:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) and to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

rate. Andrea an 6-but

Mr. John Credidio January 10, 1994 Page 2

The VSI has been scheduled for Friday, January 14, 1994. The inspection team will consist of Michael Keefe and Carla Buriks of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Kevin M. Pierard, Chief

OH/MN Technical Enforcement Section

Enclosure

cc:

Larry Eastep, IEPA Anna Van Orden, IEPA



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

January 10, 1994

RECEIVED JAN 2 5 1994 WMD RCRA RECORD CENTER

Mr. John Credidio Chicago Studio City 5660 W. Taylor Street Chicago, IL 60644

Re: Visual Site Inspection

Former General Electric Company Facility

Chicago, IL ILD 005 255 096

Dear Mr. Credidio:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) and to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

Mr. John Credidio January 10, 1994 Page 2

The VSI has been scheduled for Friday, January 14, 1994. The inspection team will consist of Michael Keefe and Carla Buriks of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Kevin M. Pierard, Chief

OH/MN Technical Enforcement Section

Enclosure

cc:

Larry Eastep, IEPA Anna Van Orden, IEPA

#### ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

- 1. Two copies of a detailed map of the facility
- 2. Facility history, including dates of operation, ownership changes, and production processes
- 3. Current facility operations
- 4. Processes that generate waste that is treated, stored, or disposed of at the facility
- 5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
- 6. Security at the facility
- 7. Information regarding geology and the uses of ground water and surface water in the
- 8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
- 9. Records of any spills that may have occurred at the facility
- 10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU